

REMARKS

In response to the Official Action mailed July 13, 2004, Applicants respectfully request reconsideration. In this Response, no claims are added, canceled, or amended so that claims 1-39 remain pending. No new matter has been added.

The Official Action rejected claims 1-39 as anticipated by Collins (US Patent 6,173,075). That rejection is respectfully traversed.

An interview was held between Examiner Havan and Applicants' representative on August 17, 2004. The subject of the interview related to the limitations of claims 1, 7-9, 19, 25-27 and 38 with respect to Collins. Applicants maintained that Collins fails to teach all of the limitations of those claims. The Examiner indicated that an updated search may be necessary.

Collins cannot anticipate the invention because Collins fails to teach a bitmap brush. A bitmap brush is defined in the patent application as a virtual paint brush specified by a bitmap image (see page 1, lines 13-16; page 3, lines 5-6; and Figures 2-5 of the patent application). Collins teaches nothing remotely similar to such a virtual paint brush, and thus provides nothing that could be reasonably interpreted as the claimed bitmap brush. Accordingly, Collins cannot teach *determining a first segment in a bitmap brush* corresponding to a first polygon on a guideline, or *applying a transformation to a bitmap image mapped in the first segment of the bitmap brush* to generate a corresponding bitmap image on the guideline.

Moreover, there is no motivation to modify Collins to include a bitmap brush. Collins relates to converting a line art drawing into a vector representation. Thus, images are more easily stored and processed than as compared to pixmap format (see column 4, line 46 to column 5, line 39 of Collins). If Collins were modified to include a virtual paint program with a bitmap brush, the vector conversion process of Collins would be rendered moot, as the virtual paint strokes would already have a mathematical representation. Moreover, Collins teaches away from the present invention, since it discloses that vector representations of scanned line art are easier to store and process than pixmap (bitmap) representations (see column 4, line 46 to column 5, line 39 of Collins). Thus, it would be entirely counterintuitive for one of ordinary skill in the art to modify Collins to include a bitmap brush for creating a bitmap image on a guideline, as claimed in the present application.

Thus, Collins fails to teach every limitation of claims 1, 19, and 38. Accordingly, the rejection is erroneous and should be withdrawn. Moreover, an obviousness-type rejection based on Collins as the primary reference would also be erroneous.

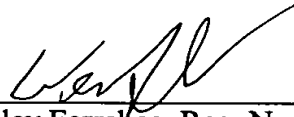
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Regarding claims 7-8 and 25-26, Collins fails to teach a bilinear transformation. The binary transformation is distinctly defined in the specification at page 24, lines 4-14 of the patent application. Clearly, a weighted average is not a bilinear transformation as defined within the scope of this application.

Moreover, the rejection of claims 2-18, 20-37, and 39 is dependent upon the propriety of the rejection of claims 1, 19, and 38. Because those rejections are erroneous, the rejection of claims 2-18, 20-37, and 39 should also be withdrawn.

Reconsideration and withdrawal of the rejection are earnestly solicited.

Respectfully submitted,



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Amendment or ROA - Regular (Revised 9/03/03)